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5 Attorney for Defendant

6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE EASTERN DISTRICT OF CALIFORNIA

8
9 UNITED STATES OF AMERICA,) Case No.: 2:12 CR 00141 JAM
10 Plaintiff,) 2:91 CR 00037 JAM
11 vs.)
12 IMRAN MIR,) STIPULATION REGARDING
13 Defendant) EXCLUDABLE TIME PERIODS UNDER
14) SPEEDY TRIAL ACT FINDINGS AND
15) ORDER
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Plaintiff, United States of America, by and through its counsel of record, and the defendant, IMRAN MIR, by and through his counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on July 9, 2013.
2. By this stipulation, the defendant now moves to continue the status conference until August 6, 2013 at 9:45 a.m., and to exclude time between July 9, 2013 and August 6, 2013 under Local Code T4. Plaintiff does not oppose this request.
3. The parties agree and stipulate, and request that the Court find the following:
 - a. Counsel for the defendant desires additional time to consult with his client regarding his sentencing.

b. Counsel for the defendants believe that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

c. The government does not object to the continuance.

d. Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendants in a trial within the original date prescribed by the Speedy Trial Act.

e. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of July 9, 2013, to August 6, 2013, at 9:15 a.m. inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Respectfully submitted,

Date: 7-8-13

By: /s/ Danny D. Brace, Jr.,
DANNY D. BRACE, JR.,
Attorney for
Imran Mir

1 Date: 7-8-13
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By:/s/ Jason Hitt
Authorized to sign for Mr. Hitt
On July 8, 2013
Jason Hitt
Assistant U.S. Attorney

5 **IT IS SO ORDERED:**

6 **Dated: 7/8/2013**

7 /s/ John A. Mendez
8 HON. JOHN A. MENDEZ
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